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February 4, 2025

Via ECF

Hon. Christina Reiss
U.S. District Court of Vermont
P.O. Box 446
Burlington, VT 05402-0446

Dear Judge Reiss:

Re: Black Love Resists in the Rust, et al. v. City of Buffalo, et al.
U.S. District Court for the Western District of New York
Civil Action No. 18-cv-00719-CCR

This office represents the City Defendants in the above-captioned matter. We write this letter pursuant to Local Rule of Civil Procedure 7(a)(2)(C) to request permission to exceed the page limit applicable to memoranda of law in this District when we file a motion for summary judgment this week. Our motion is due to be filed on Friday, February 7, 2025. Specifically, we write to request permission to exceed the twenty-five-page limit by a total of thirty-five (35) pages, for a total of sixty (60) pages. In other words, we request permission to file a memorandum of law not to exceed sixty pages in support of the City Defendants' motion for summary judgment.

There are four causes of action related to three proposed classes pending against the City Defendants. Discussing the application of the elements for each of these causes of action will, in and of itself, take up a considerable amount of space in the City Defendants' brief. Additional defenses related to the individual City representatives named in this case and Plaintiffs' request for injunctive relief will require a substantial number of pages to dissect. Given the number and complexity of the legal issues to be briefed on summary judgment, we submit that good cause exists for our brief to exceed this District's twenty-five-page limit by thirty-five pages.

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We have discussed this request with counsel for Plaintiffs, and they have consented to this request. In turn, the City Defendants consent to a reciprocal 60-page limit for Plaintiffs' opposition to the City Defendants' motion for summary judgment. We thank the Court in advance for its consideration.

Respectfully submitted,


Cheyenne Freely

CC: All counsel of record via ECF